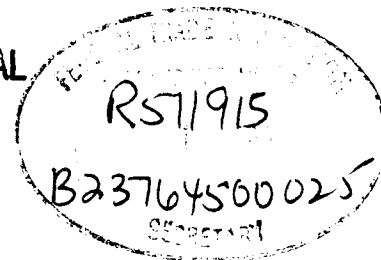


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CLEAN, INC., dba COMET CLEANERS • 1520D Tramway Boulevard NE • Albuquerque, NM 87112 • (505) 294-7438 • FAX 292-7248

February 25, 1999

ORIGINAL



Secretary
Federal Trade Commission
6th & Pennsylvania Ave NW
Washington, DC 20580

Dear Secretary

Re: 16 CFR Part 423—Care Label Rule

Clean, Inc., dba Comet Cleaners is the largest cleaner in the state of New Mexico. We have 8 full cleaning plants, 3 shirt laundries, and we employ 107 employees. We process nearly 1,500,000 garments annually. All our plants are located in the greater Albuquerque area. We definitely support alternative labeling—for ALL appropriate methods of care.

Consumers should know every possible or acceptable method for caring for their garments, not simply one method. It would be easier, from a professional cleaners standpoint, to educate our customers if the labels they have were more complete. Multiple care procedures can be provided at a reasonably low cost. Our labeling needs to be at least as comprehensive as the labeling within the European community. We would support universal standards for labeling. Alternative labeling does not increase the use of perchloroethylene, as more comprehensive labels, not excluding dry cleaning, could increase the use of wet cleaning methods. Consumers require accurate labeling to properly care for their clothes and make informed decisions.

Q Should the rule be amended to require a washing instruction for all items that can safely be washed at home, even if dry cleaning would be an appropriate alternative care method?

A Yes, we feel washing instructions should be included. However, other methods, such as dry-cleaning, should NOT be excluded, so that the consumer can make an informed choice based upon personal needs and preferences.

Q Can criteria be identified that would assist manufacturers in determining when a home-laundering instruction, although technically feasible, should not be used because it would result in a less than ideally refurbished garment?

A We do feel a criteria could be identified if manufacturers, cleaners, and the International Fabricare Institute would work together. Testing of fabrics before construction is available and would save consumers frustration resulting from improper labeling. For example, Tommy Hilfiger fabrics should have been tested for colorfastness prior to construction. Had Hilfiger done so, the company would have been saved thousands of dollars in replacement garments due to dye loss. Hilfiger now must recover from their tarnished image, and customers need to regain confidence in the quality they are spending a great deal to buy. Other items, such as black cotton, or any linen, may be washed. However, due to finishing procedures available through professional cleaning, they will retain their wear-life and appearance for much longer.

COMET CLEANS ALBUQUERQUE

Q Should the commission amend the Rule to permit, or to require, a "Professionally Wetclean" instruction?

A It may be premature to use the term "Professionally Wetclean" as the industry is still learning about this alternative cleaning method. There is an issue with the use of chemicals. However, there may be an issue with water usage in some parts of the country. Purely wetcleaning is not the panacea at this point. (We currently wet clean a great deal of clothing, but we have also been listed as a top user of water in the Albuquerque area and have been asked to make reductions. Our public utilities department will be visiting us soon to help us reduce our water usage without hurting our service to our customer.)

Q How should the Rule define "Professional Wetcleaning?"

A The actual process of wetcleaning does not vary drastically from wetcleaning in a home. The "Professional" aspect in wetcleaning tends to refer more to the finishing that is performed upon the garment, exceeding domestic standards.

Q Should the requirement specify a type of professional wetcleaning equipment?

A While some equipment may be more desirable, there is no way on a label to assure the professional quality of the operator. We feel it is a consumer's responsibility to assure their cleaning professional is indeed professional, regardless of their choice of equipment. This is a free enterprise country and cleaning professionals should have the right to choose their equipment.

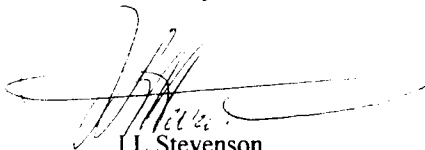
Q Should the inclusion of other appropriate care methods be mandatory or optional?


A We feel all appropriate care methods should be mandatory so the consumer can select the method they prefer knowing all their options. Cleaning professionals should also have the freedom to choose among the acceptable methods given a particular situation without having to explain to their consumer why all this information was not provided to them at the time of purchase. The consumer and professional cleaner would be allowed to work together in the maintenance of their wardrobe, rather than be adversarial. The entire point to the care labels is allowing consumers to have the right to choose and protect their investments.


We greatly appreciate the opportunity to share our thoughts and frustrations with you on this issue. It is often aggravating to deal with care labels daily without the benefit of input into their content. Please keep the record open. We are committed to providing a voice for our customers and colleagues. We would like to survey our customers regarding this issue, and add any information they feel is pertinent as consumers from time to time.

Thank you again.

Sincerely


J.L. Stevenson
President


Tamara Stevenson-Bradley
Secretary-Treasurer


Troy Bradley
Director of Administration